

# **EXHIBIT 10**

**Subject:** RE: Wishart v Welkley - Remote Collecitons  
**Date:** Friday, April 30, 2021 at 12:00:16 PM Eastern Daylight Time  
**From:** Deutsch, Hillel  
**To:** Joshua S. Moskowitz, Emily Bear, rob  
**CC:** Wolfgang Wilke  
**Attachments:** ~WRD000.jpg, image001.jpg

Josh,  
Agreed, I have done so.  
Hillel

Hillel Deutsch  
NYS Assistant Attorney General  
144 Exchange Blv. Rochester, NY 14614  
(585) 546-7430

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**From:** Joshua S. Moskowitz <josh@moskovitzlaw.com>  
**Sent:** Thursday, April 29, 2021 3:35 PM  
**To:** Emily Bear <emily@4discovery.com>; Deutsch, Hillel <Hillel.Deutsch@ag.ny.gov>; rob <rob@ricknerpllc.com>  
**Cc:** Wolfgang Wilke <wolf@4discovery.com>  
**Subject:** Re: Wishart v Welkley - Remote Collecitons

Thank you Emily.

Hillel, it appears that only one of the defendants has scheduled a collection time. Please ensure your clients schedule collections times promptly.

**Joshua S. Moskowitz**

The Law Office of Joshua Moskowitz, P.C.  
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**From:** Emily Bear <emily@4discovery.com>  
**Date:** Thursday, April 29, 2021 at 3:31 PM  
**To:** "Deutsch, Hillel" <Hillel.Deutsch@ag.ny.gov>, "Joshua S. Moskowitz" <josh@moskovitzlaw.com>, Rob Rickner <rob@ricknerpllc.com>  
**Cc:** Wolfgang Wilke <wolf@4discovery.com>  
**Subject:** Re: Wishart v Welkley - Remote Collecitons

Hi All,

Nice to e-meet you, I'm the Operations Manager here at 4Discovery- and I'll be helping Wolf to coordinate our remote collections for this matter.

[Here](#) is a google sheet to keep track of which custodians have set up times, and when they are scheduled (I've added you all individually by the emails on this email chain). We will be updating this live with any times that have been scheduled.

Please let me know if you have any questions or would like to be included on any of these time slots with the custodians and our examiners.

Best,  
Emily

**Emily Bear**  
Operations Manager

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On Apr 26, 2021, at 11:02, Deutsch, Hillel <[Hillel.Deutsch@ag.ny.gov](mailto:Hillel.Deutsch@ag.ny.gov)> wrote:

I sent the email this morning. I assume 4Discovery tracks scheduling of collection times; if this is not correct let me know.

Hillel

Hillel Deutsch  
NYS Assistant Attorney General  
144 Exchange Blv. Rochester, NY 14614  
(585) 546-7430

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**From:** Joshua S. Moskowitz <[josh@moskovitzlaw.com](mailto:josh@moskovitzlaw.com)>  
**Sent:** Monday, April 26, 2021 11:51 AM  
**To:** Deutsch, Hillel <[Hillel.Deutsch@ag.ny.gov](mailto:Hillel.Deutsch@ag.ny.gov)>  
**Cc:** Emily Bear <[emily@4discovery.com](mailto:emily@4discovery.com)>; Wolfgang Wilke <[wolf@4discovery.com](mailto:wolf@4discovery.com)>; rob <[rob@ricknerpllc.com](mailto:rob@ricknerpllc.com)>  
**Subject:** Re: Wishart v Welkley - Remote Collecitons

Hillel,

Please confirm once you have sent the email to your clients and when they have all scheduled collection times.

**Joshua S. Moskowitz**

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**From:** Wolfgang Wilke <[wolf@4discovery.com](mailto:wolf@4discovery.com)>

**Date:** Friday, April 23, 2021 at 3:21 PM

**To:** "Deutsch, Hillel" <[Hillel.Deutsch@ag.ny.gov](mailto:Hillel.Deutsch@ag.ny.gov)>

**Cc:** "Joshua S. Moskowitz" <[josh@moskovitzlaw.com](mailto:josh@moskovitzlaw.com)>, Emily Bear <[emily@4discovery.com](mailto:emily@4discovery.com)>

**Subject:** Re: Wishart v Welkley - Remote Collecitons

It would. If necessary, we can certainly facilitate calls in advance of the collection with individual custodians if they believe it necessary.

Wolf

On Fri, Apr 23, 2021 at 1:04 PM Deutsch, Hillel <[Hillel.Deutsch@ag.ny.gov](mailto:Hillel.Deutsch@ag.ny.gov)> wrote:

This would be instead of a conference call?

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**From:** Wolfgang Wilke <[wolf@4discovery.com](mailto:wolf@4discovery.com)>

**Sent:** Friday, April 23, 2021 10:31 AM

**To:** Joshua S. Moskowitz <[josh@moskovitzlaw.com](mailto:josh@moskovitzlaw.com)>; Deutsch, Hillel <[Hillel.Deutsch@ag.ny.gov](mailto:Hillel.Deutsch@ag.ny.gov)>

**Cc:** Emily Bear <[emily@4discovery.com](mailto:emily@4discovery.com)>

**Subject:** Wishart v Welkley - Remote Collecitons

[EXTERNAL]

Mr. Deutsch,

Thank you for scheduling a call with the custodians for next week to being the remote collection process for their individual ESI.

In an effort to streamline this process, I would prefer if the following email message is sent to all the custodians instead. To summarize the collection process, we would like to propose the following procedure:

1. By clicking on the link provided, each custodian can schedule a time the is convenient for them to perform the process. They can also provide appropriate shipping information at that time.
2. Once the time is confirmed, we will ship our remote collection kit to the address provided.
3. At the time of collection, the custodian should have available all devices that are in operating condition as well as the logins and passwords for the social media accounts to be collected.
4. After the imaging is complete, the custodian can re-package the kit and return it to 4Discovery using the enclosed return shipping label. The package is large enough for the custodian to include any other devices that are not in working order for 4Discovery to conduct a physical examination.
5. The custodian will be expected to return the kit within 72 hours of the process being completed.
6. Once the physical examination is complete, 4Discovery will return those devices back to the individual custodians.

The email message I would like sent is situated between the lines:

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 4Discovery, a digital forensic firm based in Chicago, has been contracted to preserve your electronic data in the Wishart v Welkley matter. Please use the following link to schedule a time to perform your collection:

<https://tidycal.com/4discovery/mobile-remote-collection-kick-off>

During the collection time, you will not be able to use your devices while they are being collected, so please take that into consideration when scheduling. Once you have confirmed your collection time frame, a package from Wolfgang Wilke, the project leader at 4Discovery, will be sent to the location you provided. This package from FedEx will contain a remote collection kit, including an external hard drive, cables, and the equipment needed to preserve your data. You will need to be present to accept the package as adult signature is required.

At the time of the collection, a 4Discovery examiner will contact you at the phone number provided. Please be prepared for the collection process by:

- Have available all account user names and passwords for items being collected
- All devices are powered on, fully charged, and plugged in

The length of time to complete the collection will vary based on amount of data and number of devices/accounts being collected.

Once the collection process is complete, please re-package the remote collection kit along with any cables or external devices that were include and return to 4Discovery using the shipping label sent with the kit. If any of your devices are non-functioning, include those items in the return package for 4Discovery to complete a phsical inspection of the devices. These items will be returned to you once the inspection is complete.

If you have any questions about this process, please contact your counsel to set up a call with 4Discovery in advance of your scheduled collection time.

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If you would like to have a call to discuss this approach in more detail, please let me know a time that works best for you.

Best regards,

--

**Wolfgang Wilke**

*Forensic Investigator*



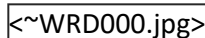


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**Wolfgang Wilke**

*Forensic Investigator*



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